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November 1, 2024

VIA ECF

Honorable Sidney H. Stein
United States District Judge
Southern District of New York
500 Pearl Street, Courtroom 23A
New York, New York 10007

**Re: *United States of America v. Menendez, et al.,*
Dkt. No. 23-cr-490-SHS**

Dear Judge Stein:

As Your Honor is aware, this firm represents defendant Wael Hana in the above-captioned matter. We write to respectfully request a modification to Mr. Hana's current conditions of release, ECF No. 513, to allow him to attend a memorial service for the family member of a friend this weekend. Specifically, Mr. Hana's current conditions of release provide that he be subject to a curfew of 9:00 p.m. to 8:00 a.m. from Monday to Friday and home incarceration on Saturday and Sunday. The memorial dinner in question takes place in Lanoka Harbor, New Jersey from 5:00 – 8:00 p.m. on Saturday, November 2, 2024. Accordingly, and in order to allow for travel time, we respectfully request that Mr. Hana's conditions be modified to permit him to leave his home to attend the above-referenced event between 3:30 and 9:30 p.m. on Saturday, November 2, 2024.

We have consulted with the Government, which has indicated that it has no objection to the request, provided Mr. Hana has his cellular phone with him, which he will. We have also conferred with the Office of Pretrial Services for the District of New Jersey, which presently supervises Mr. Hana, and the Southern District of New York, neither of which has any objection to the request. If the foregoing meets with Your Honor's approval, we respectfully request that the Court "So Order" this letter in the space indicated below. Of course, if Your Honor has any questions or concerns, please do not hesitate to contact me. We thank the Court for its very kind consideration of this request.

Respectfully submitted,

s/ Lawrence S. Lustberg
Lawrence S. Lustberg

GIBBONS P.C.

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SO ORDERED:

This ____ day of November, 2024

Honorable Sidney H. Stein
United States District Judge

cc: All counsel of record (via ECF)
David Hernandez (via email)
Jonathan Lettieri (via email)